

THE ZUPPA FIRM PLLC

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February 22, 2012

The Honorable Judge Frederic Block
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Government Employees Insurance Company et al v. Nelly Razzakova, L.Ac et al
Case No. 11-cv-03247-FB-SMG

Dear Judge Block:

The undersigned represents Defendant Andrey Anikayev ("Anikayev") in the above captioned case.

As per this Court's prior rulings – especially the Court's Electronic Order of January 17, 2012 – I am requesting a pre-motion conference with respect to the Defendant Anikayev's motion "to dismiss the Complaint in its entirety pursuant to F.R.C.P. 12(b) (6) for failure to state a claim upon which relief can be granted".

The prerequisites as per this Court's Electronic Order of January 17, 2012 have been met.

As demonstrated by Attorney Tsirelman in his letter motion (filed on February 17, 2012; Document Number 125) currently before the Court seeking a pre-motion conference Judge John Gleeson has rendered his decision on the arbitration issue that was before him. I do not believe that Judge Gleeson's decision has rendered the current proceedings moot.¹

As such the Defendant Anikayev is following the Court's instructions contained in the Electronic Order of January 17, 2012 in requesting this conference.

With Much Respect,



Raymond J. Zuppa

¹ In this era where the not too cynical may believe that democracy is an illusion and the Justice has acquired sight the Decision of the Honorable Judge Gleeson in its painstaking analysis and reasoning is the very height of transparency that our founding fathers dreamed of. Whether one agrees with the outcomes or not, praises should be sung loudly for Judge Gleeson's decisions and his work. The rationale behind Judge Gleeson's decisions is always there for all to see.